

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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DEBORAH S. SKEANS, Executrix of  
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,  
LLC, KEY COMMERCIAL  
FINANCE PROPERTIES, LLC,  
EQUITY PROS, LLC, and MOBILE  
AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC

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JUSTIN BILLINGSLEY and KEY  
COMMERCIAL FINANCE, LLC,

Third-Party  
Plaintiffs,

v.

DEBORAH S. SKEANS and  
DARBIN SKEANS,

Third-Party  
Defendants.

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**PLAINTIFF'S REQUEST FOR ORAL ARGUMENT**

Pursuant to Rule 7.1.4 of the Local Rules of Civil Practice and Procedure of  
the United States District Court for the District of Delaware, plaintiff, Deborah S.

Skeans, Executrix of the Estate of Frank E. Pavlis, respectfully requests the Court schedule oral argument on the following motions, which are fully briefed, at a time convenient for the Court and the parties:

1. Plaintiff's Motion for Partial Summary Judgment (D.I. 82); and
2. Defendant's Motion for Summary Judgment (D.I. 78).

STRADLEY RONON  
STEVENS & YOUNG, LLP

/s/ Joelle E. Polesky

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*Attorneys for Plaintiff,  
Deborah S. Skeans, Executrix of  
the Estate of Frank E. Pavlis*

Dated: September 8, 2020